

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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Elaine Aghaeepour; Anne Barr; Bruce Drago;
Julie Higgins; Shane Moore; Michele Norris;
Jesus Rivera; and Hong Zhang,

Plaintiffs,

- against -

14 CV 5449 (NAR) (LMS)

Northern Leasing Systems, Inc.; MBF Leasing,
LLC; Lease Finance Group, LLC; Louis Cucinotta,
Jennifer Centeno a/k/a Jennifer Nugent, Jay Cohen,
Sara Krieger, Joseph I. Sussman, and Joseph I.
Sussman, P.C.,

Defendants.

**Affirmation of Krishnan Chittur
In Opposition to Motion to
to Dismiss the Second
Amended Complaint**

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Krishnan Chittur, an attorney duly admitted to the bar of this Court and elsewhere, hereby
solemnly declare and states as follows under penalties of perjury:

1. I am the principal of Chittur & Associates, P.C., attorneys of record for the Plaintiffs
herein. I am familiar with the facts and circumstances herein, and file this affirmation in
opposition to Defendants' motion to dismiss.
2. The accompanied memorandum of law in opposition to Defendants' motion to dismiss
certain claims in the Second Amended Complaint refers to the following documents, true
copies of which are annexed hereto:
 - a. Exhibit 1 - Verified Petition in *People v. Northern Leasing Systems, Inc.*, No.
450460/2016 (N.Y. Sup., N.Y. Co.) ("NYAG Lawsuit");
 - b. Exhibit 2 - Affidavit of Deputy Chief Administrative Judge Fern A. Fisher, filed
in NYAG Lawsuit;
 - c. Exhibit 3 - Affidavit of Judicial Hearing Officer Ernest J. Cavallo, filed in NYAG

Lawsuit.

Dated: May 10, 2017

Sd/

Krishnan Chittur, Esq.